

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

INGRID M. FISHER	:	
AND	:	
SYLVIA AYLER	:	CIVIL ACTION
	:	NO.: 2:12-CV-3834
Plaintiff	:	
v.	:	
	:	
COMMONWEALTH FINANCIAL	:	
SYSTEMS, INC.	:	
And	:	
NORTHEAST CREDIT AND	:	
COLLECITONS, INC.	:	
And	:	
SALLIE MAE, INC. ADMIN AGENT	:	
FOR SLM EDUCATION LOAN CORP.	:	
Defendants	:	

**MOTION OF DEFENDANT COMMONWEALTH FINANCIAL SYSTEMS, INC.,
TO VACATE DEFAULT JUDGMENT PURSUANT TO FED.R.CIV.P. 55 (c) and
60(B)**

Pursuant to Federal Rule of Civil Procedure 55(c) and 60(b), Defendant, Commonwealth Financial Systems, Inc., by and through its attorneys, Edwin A. Abrahamsen & Associates P.C., hereby moves this Honorable Court to Vacate the Default Judgment entered on January 31, 2013, and permit it to present its meritorious defenses and/or claims in this matter. Defendant's requests are based on the attached Memorandum of law and Proposed Answer.

Edwin A. Abrahamsen & Associates, P.C.

DATE: May 31, 2013

BY: /s/ Michael F. Ratchford

Michael F. Ratchford, Esquire

PA Attorney I.D. No.: 86285

Edwin A. Abrahamsen & Associates

120 N. Keyser Avenue

Scranton, PA 18504

Attorney for Commonwealth Financial Systems, Inc.

